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6 Attorneys for Plaintiff  
STATE BANK OF TEXAS

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

10 STATE BANK OF TEXAS, a Texas  
11 state-chartered bank, as successor-in-  
interest to the original lender,

**Plaintiff,**

V.

14 SAM PARABIA, an individual; and  
15 PERIN PARABIA, an individual, and  
DOES 1 through 10, inclusive,

## Defendants.

Case No. 3:14-cv-3031-L-DHB

**DECLARATION OF LAWRENCE  
J. HILTON IN SUPPORT OF  
PLAINTIFF'S REQUEST FOR  
ENTRY OF DEFAULT BY CLERK  
AGAINST DEFENDANT FARZIN  
MORENA**

[Plaintiff's Request for Entry of Default  
by Clerk against Defendant Farzin  
Morena filed concurrently herewith]

I, Lawrence J. Hilton, declare as follows:

21       1. I am a partner at the law firm of One LLP, counsel for plaintiff State  
22 Bank of Texas (“State Bank”). I am the attorney who has been primarily  
23 responsible for representing State Bank in this action. I have personal knowledge of  
24 the facts stated herein and, if called as a witness, I could and would competently  
25 testify thereto.

26       2. I make this declaration in support of State Bank's Request for Entry of  
27 Default by Clerk against defendant Farzin Morena ("Morena").

1       3.     On July 8, 2016, State Bank caused to be served on Morena the  
2 Verified Second Amended and Supplemental Complaint for Judicial Foreclosure on  
3 Deed of Trust (“Second Amended Complaint”). As the proof of service filed with  
4 the Court on July 18, 2016 (Dkt. No. 67) shows, Mario Gomez of Nationwide Legal,  
5 LLC, on behalf of State Bank, personally served summons and Second Amended  
6 Complaint on Morena at his residence at 11 Merrill Hill, Ladera Ranch, California  
7 on July 8, 2016, at 7:04 a.m. A true and correct copy of said Proof of Service (Dkt.  
8 No. 67) is attached hereto as Exhibit A.

9       4.     More than twenty-one days have now passed since defendant Morena  
10 was served with the Second Amended Complaint on July 8, 2016, yet Morena has  
11 not, as of the date of this declaration, filed a responsive pleading. Therefore, it is  
12 appropriate for the Clerk of Court to enter Morena's default in this action.

13 I declare under penalty of perjury under the laws of the United States of  
14 America that the foregoing is true and correct. Executed on August 3, 2016 at  
15 Newport Beach, California.

/s/ Lawrence J. Hilton  
Lawrence J. Hilton

**CERTIFICATE OF SERVICE**

2 I hereby certify that on August 4, 2016, I electronically transmitted the  
3 foregoing document using the CM/ECF system for filing, which will transmit the  
4 document electronically to all registered participants as identified on the Notice of  
5 Electronic Filing, and paper copies have been served on those indicated as non-  
6 registered participants.

/s/ Lawrence J. Hilton

## Lawrence J. Hilton